

Exhibit 30



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Court Reporting and
Litigation Services

Daniel Conwell

June 15, 2021

Maritz Holdings Inc. and Maritz Motivation In.

vs.

Drew Carter, et al

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MARITZ HOLDINGS, INC., and)	
MARITZ MOTIVATION, INC.,)	
)	
Plaintiffs,)	
)	
v.)	No. 4:21-cv-00438
)	
DREW CARTER, CHRIS DORNFELD,)	
JESSE WOLFERSBERGER, LAUREL)	
NEWMAN, ANDREW HRDLICKA, BEN)	
VALENTI, DANIEL DONWELL, and)	
WHISTLE SYSTEMS, LLC,)	
)	
Defendants.)	

DEPOSITION OF DANIEL CONWELL

June 15, 2021
8:39 a.m.

Reporter: John Arndt, CSR, CCR, RDR, CRR
CSR No. 084-004605
CCR No. 1186

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1 **A. Anyone in the company besides three**
2 **people.**
3 Q. Who were the three people?
4 **A. Or four people. Scott Alred, Brian Munks,**
5 **Beth Hassler, and Rob Babke.**
6 Q. Whose decision was it to shut you off?
7 **A. Do I answer that from what I knew at the**
8 **time or what I know now?**
9 Q. What you know now.
10 **A. What I know now? I think it was Steve**
11 **Gallant and Rick Ramos?**
12 Q. Do you know -- from what you know now,
13 were you ever told why you and the others were cut off
14 the Atlas database?
15 **A. Yes.**
16 Q. And what was that?
17 **A. It was because they cut access to the**
18 **senior executive team, but they -- and then they -- but**
19 **they took it away from everybody to completely redo the**
20 **permissions structure in Atlas.**
21 Q. Was your access to Atlas ever restored?
22 **A. At first partially and then like my last**
23 **day fully.**
24 Q. How many days was it between the time you
25 were part -- you were fully shut off and the time you

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1 were partially allowed back in?
2 **A. I don't remember the exact number, but I**
3 **would say it's one to two weeks.**
4 Q. And then on your final day you were given
5 full access, full privileges?
6 **A. Sorry. Not my final day. My final two**
7 **weeks.**
8 Q. And is that starting with the time you
9 resigned and ending on your final day?
10 **A. Yes.**
11 Q. Were you ever told why you were given full
12 access during your final two weeks?
13 **A. Yes.**
14 Q. And why is that?
15 **A. Because I was transferred from the Atlas**
16 **team because they were -- I was transferred from the**
17 **decision sciences Atlas team and moved into engineering**
18 **because they were getting rid of the Atlas team, from**
19 **what I understood.**
20 Q. And it was only after you were transferred
21 onto the engineering team that you had the full access
22 to Atlas?
23 **A. Correct.**
24 Q. Did you write any schema during your final
25 two weeks?

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1 **A. Not that I can remember.**
2 Q. So on the Monday after the Friday happy
3 hour, so you go into work, you're shut off the Atlas
4 database, as were others. Did there come a time when
5 there were further discussions between you and anyone
6 else about you going to work with an organization that
7 Drew Carter would be a part of?
8 **A. Yes, on September 15th or around there.**
9 Q. And tell me about that.
10 **A. So I met at Drew's house, and they just**
11 **presented me at the time their idea of what Whistle**
12 **would become or what they wanted to do with Whistle,**
13 **and that was -- and then we had lunch. That was**
14 **basically the meeting.**
15 Q. So on September 15th, there was a meeting
16 of various people at Drew Carter's home; is that
17 correct?
18 **A. Yes. Around September 15th. I don't**
19 **remember the exact date, but yeah.**
20 Q. So -- is it a nice house?
21 **A. Yes.**
22 Q. And you had lunch there too; is that
23 correct?
24 **A. Yes.**
25 Q. Was a formal offer of employment made to

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1 you?
2 **A. Define formal. Like with the -- or with a**
3 **salary and everything, or --**
4 Q. Well, what type of -- what communications
5 were made to you about the role you might play in
6 Whistle?
7 **A. I don't recall exactly what happened, but**
8 **essentially -- I don't know if there -- there wasn't**
9 **any explicit communication, like "Do you want to come**
10 **work with us?" I mainly asked like when can I start.**
11 **But it wasn't like an official decision or agreement at**
12 **the time.**
13 Q. So you asked Drew when can you start?
14 **A. Yes.**
15 Q. What does he say?
16 **A. He had said it depends on if -- or he**
17 **asked how important pay was at the time.**
18 Q. And what did you say?
19 **A. I said somewhat important.**
20 Q. And what did he say then?
21 **A. That he wouldn't be able to pay me for**
22 **about a month at the time.**
23 Q. Did he say why?
24 **A. Because funding had not been gathered,**
25 **lined up at that time.**

10 (Pages 34 to 37)

<p style="text-align: right;">Page 106</p> <p>1 [SIGNATURE RESERVED.]</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 108</p> <p>1</p> <p>2</p> <p>3 I, DANIEL CONWELL, the witness herein,</p> <p>4 having read the foregoing testimony of the pages of</p> <p>5 this deposition, do hereby certify it to be a true and</p> <p>6 correct transcript, subject to the corrections, if any,</p> <p>7 shown on the attached page.</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12 _____</p> <p>13 DANIEL CONWELL</p> <p>14</p> <p>15 Sworn and subscribed to before me,</p> <p>16 This _____ day of _____, 2021.</p> <p>17</p> <p>18</p> <p>19 _____</p> <p>20 Notary Public</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 107</p> <p>1 CERTIFICATE</p> <p>2</p> <p>3 I, JOHN ARNDT, a Certified Shorthand</p> <p>4 Reporter and Certified Court Reporter, do hereby</p> <p>5 certify that prior to the commencement of the</p> <p>6 examination, DANIEL CONWELL was sworn by me to testify</p> <p>7 the truth, the whole truth and nothing but the truth.</p> <p>8 I DO FURTHER CERTIFY that the foregoing is a</p> <p>9 true and accurate transcript of the proceedings as</p> <p>10 taken stenographically by and before me at the time,</p> <p>11 place and on the date hereinbefore set forth.</p> <p>12 I DO FURTHER CERTIFY that I am neither a</p> <p>13 relative nor employee nor attorney nor counsel of any</p> <p>14 of the parties to this action, and that I am neither a</p> <p>15 relative nor employee of such attorney or counsel, and</p> <p>16 that I am not financially interested in this action.</p> <p>17</p> <p>18</p> <p>19 _____</p> <p>20 JOHN ARNDT, CSR, CCR, RDR, CRR</p> <p>21 CSR No. 084-004605</p> <p>22 CCR No. 1186</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 109</p> <p>1</p> <p>2 DEPOSITION ERRATA SHEET</p> <p>3</p> <p>4 Page No. _____ Line No. _____ Change to: _____</p> <p>5 _____</p> <p>6 Reason for change: _____</p> <p>7 Page No. _____ Line No. _____ Change to: _____</p> <p>8 _____</p> <p>9 Reason for change: _____</p> <p>10 Page No. _____ Line No. _____ Change to: _____</p> <p>11 _____</p> <p>12 Reason for change: _____</p> <p>13 Page No. _____ Line No. _____ Change to: _____</p> <p>14 _____</p> <p>15 Reason for change: _____</p> <p>16 Page No. _____ Line No. _____ Change to: _____</p> <p>17 _____</p> <p>18 Reason for change: _____</p> <p>19 Page No. _____ Line No. _____ Change to: _____</p> <p>20 _____</p> <p>21 Reason for change: _____</p> <p>22</p> <p>23 SIGNATURE: _____ DATE: _____</p> <p>24 DANIEL CONWELL</p> <p>25</p>

28 (Pages 106 to 109)